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December 28, 2020

**VIA ECF**

Hon. Kenneth M. Karas  
United States District Court for Southern District of New York  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas St. Courtroom 521  
White Plains, NY 10601-4150

Re: *Jane McSpirit v. CoventBridge (USA), Inc.*, Civil Action No. 7:20-cv-05754 (KMK)

Dear Judge Karas:

We represent Defendant CoventBridge (USA), Inc. ("CoventBridge") in the above-referenced case. We write on behalf of both parties to seek Court approval for a 70-day stay of proceedings pending completion of private mediation.

**I. Private Mediation**

The parties have agreed to a mediator. The parties are in the process of finalizing dates, but the intention is to proceed with mediation on or around February 10, 2021.

**II. Stay Of Proceedings**

We write on behalf of both parties to request a 70-day stay of proceedings pending mediation, through and including March 8, 2021. This first request for a stay is sought for the purpose of allowing the parties to preserve their resources while preparing for mediation. On or before March 8, 2021, the parties will submit a joint status report apprising the Court as to the status of settlement discussions and the outcome of the mediation.

The following deadlines will be impacted by the parties' joint request for a stay: (1) the deadline for the parties to meet and confer regarding the Rule 16 Initial Conference on December 21, 2020; (2) the deadline for the parties' to submit the joint case management and scheduling order on January 4, 2021; and (3) the Initial Conference set for January 11, 2021 at 11:30 AM. [Dkt. 14]. Should the stay be granted, the parties respectfully request that the first of these deadlines be due at least seven days following the expiration of the stay.

We appreciate your attention to this matter.



Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Gena Usenheimer

Gena Usenheimer

GU:CD

Granted. The Parties are to provide a status report by  
3/31/21.

So Ordered.

A handwritten signature in black ink, appearing to read 'K. Karas', with a long horizontal stroke extending to the right.

12/28/20